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September 5, 1991

5HS-11

John P. Imse, P.G.
Project Manager
ERM-North Central, Inc.
102 Wilmot Road
Suite 300
Deerfield, Illinois 60015

Re: Lenz Oil Site, Lemont, Illinois
Remedial Investigation/Feasibility Study (RI/FS)
Technical Memorandum 3B and Phase IIB Work Plan

Dear Mr. Imse:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the draft Technical Memorandum 3B and Phase IIB Work Plan submitted by ERM-North Central, Inc. on behalf of the Lenz Oil Participating Respondents (Respondents). The following comments must be addressed before the documents can be approved.

TECHNICAL MEMORANDUM 3B

1.0 Introduction

In paragraph 3, indicate the thickness of the Visqueen layer that was used during backfilling operations.

Revise Figure 1 to show both the main excavation area and the actual soil sampling locations on a site map with reference to the grid lines established by ERM (see Figure 2-2 of Technical Memorandum No. 1 for the grid lines). Also, include all surface water, sediment, and surface soil sampling locations on the site map. Since several sampling locations were revised during the field activities, for documentation purposes actual (and not proposed) sampling locations must be identified on the site map.

5.3 Conclusions

The clean up objectives during the source control remedial activities was to reduce the total organic contents in the soil to less than 5 ppm. However, the analytical results of the samples collected indicate that the main excavation area had total organic concentration (priority pollutants) of over 18,000 ppb at soil boring location SB-07. In light of the above, the statement in paragraph 1 (page 16) ... "The backfilled material is not likely to contain residual volatiles particularly since this material is the

incinerated ash from source control remedial activities." ... should be revised to reflect the exact nature of the material.

Appendix I

Item 6 of the summary of "Changes in the sample collection methodology and Work Plan" states that the U.S. EPA oversight contractor was not on-site. This statement is misleading, and should be revised to state that the U.S. EPA oversight contractor was not notified of the sampling activities.

Item 8 of the summary indicates that the sampling location at SB-12 was moved several feet to the west and samples were collected in an area which was not in the main excavation zone. High OVA readings, strong odors, and white smoke coming out of the augers were stated as the justification for such relocation of SB-12. Also, at SB-22 no samples were collected below 9 foot-depth because of high OVA readings. The Respondents have failed in adequately characterizing the nature and extent of the soil contamination still remaining at the site. The Respondents must take all appropriate health and safety measures at the site, and collect the soil samples at the original locations SB-12 & SB-22 to determine the nature and extent of soil contamination still remaining at the site.

The summary of "Soil boring activities changed from the Work Plan", indicates that bedrock was encountered at a depth of 4.5' at soil boring SB-14 and at a depth of 2.6' at SB-19. However, based on available boring logs at these locations (see boring logs for wells MW-04 & OW-01), the bedrock depths are much deeper than the depths indicated above. This discrepancy must be resolved, and additional soil samples must be collected at deeper depths at these locations. Also, revise the justification provided for SB-22 to state that U.S.EPA oversight contractor was not notified of the sample collection activities at soil boring location SB-22.

Delete item 5 of the summary of changes to the surface water sampling conducted at the Lenz Oil Site. This is not a change since the Administrative Order by Consent for the Lenz Oil Site provides for the U.S. EPA representatives to collect duplicate samples of any sample collected by the Respondents.

A review of ARDL's laboratory inorganic data has indicated that the laboratory did not follow the Contract Laboratory Program Statement of Work (7/88) protocols as approved in the Quality Assurance Project Plan for the Lenz Oil Site. As such, the data cannot be accepted, and all of the soil and sediment samples should be reanalyzed. Based on the U.S. EPA's Central Regional Laboratory (CRL)'s performance evaluation, ARDL has several deficiencies. Unless these deficiencies are corrected, a laboratory other than ARDL should be used to reanalyze the soil samples for inorganic contaminants. In this regard, we had transmitted in June 1991, a facsimile copy of the results of the ARDL's performance evaluation for your information.

A detailed audit of random sample groups (organics) indicated both technical and documentation deficiencies, and as such, the data is not acceptable. Soil should be re-sampled at all of the original sampling locations for organic analyses.

PHASE IIB WORK PLAN

1.0 Introduction

Paragraph 1 on page 2 states "The backfilled material is not likely to contain residual volatiles particularly since this material is the incinerated ash from source control remedial activities. Therefore existing volatile contamination is most likely from a different source." The existing contamination in the main excavation area (especially at sample location SB-07) indicate that either the incinerated ash did not meet the original clean up objectives or that the soil in some portions of the main excavation area was never incinerated. The implication in this paragraph that another source exists is not supported by the data. This paragraph should be modified accordingly.

Since the quality of a majority of the laboratory data generated by ARDL is unacceptable, a second round of surface water and sediment samples in the adjacent drainage ditch should be collected for chemical analyses.

In addition to the above, we are also attaching comments made by PRC Environmental, Inc. Please address all the comments and submit the final document to reach this office no later than October 4, 1991.

If you have any questions in this regard, please do not hesitate to contact me.

Sincerely yours,

Nan Gowda, P.E.
Remedial Project Manager

Enclosures:

cc: Shirley Baer, IEPA
Mark Furse, KMZ

bcc: **Melinda Gould, RERB**
Stu Hersh, ORC